

Barbara Anne Sousa
Assistant General Counsel



185 Franklin Street, 13th Floor
Boston, MA 02110-1585

Phone 617 743-7331
Fax 617 737-0648
barbara.a.sousa@verizon.com

March 20, 2006

Mary L. Cottrell, Secretary
Department of Telecommunications & Energy
Commonwealth of Massachusetts
One South Station, Second Floor
Boston, MA 02110

Re: D.P.U./D.T.E. 96-106 – IntraLATA Presubscription

Dear Ms. Cottrell:

Enclosed for filing in the above-referenced docket is Verizon Massachusetts' Motion for Relief.

Thank you for your assistance in this matter.

Very truly yours,

A handwritten signature in cursive script that reads "Barbara Anne Sousa".

Barbara Anne Sousa

Attachment

cc: Michael Isenberg, Director - Telecommunications Director

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Investigation by the Department of Public Utilities)
on its own motion as to the propriety of the rates)
and charges set forth in the following tariffs:)
M.D.P.U. Nos. 10 and 15, filed with the)
Department on August 18, 1997, to become)
effective October 10, 1997, by New England)
Telephone and Telegraph Company, d/b/a)
Bell Atlantic-Massachusetts))

D.T.E./D.P.U. 96-106

VERIZON MASSACHUSETTS' MOTION FOR RELIEF

Verizon New England Inc., d/b/a Verizon Massachusetts ("Verizon MA"), hereby petitions the Department to relieve the Company of the monthly quality of service reporting requirement relating to Verizon MA's implementation of intraLATA presubscription ("ILP") as set forth in the Department's May 28, 1997, Order ("*ILP Order*") in this proceeding. *See* D.T.E./D.P.U. 96-106, *ILP Order*, at 64. As grounds for its Petition, Verizon MA states as follows:

1. In its *ILP Order*, the Department ruled that Verizon MA (formerly NYNEX) "must establish some minimum ILP-specific quality measurements that will assist the Department in determining whether the Company is implementing ILP in a competitively neutral manner." *Id.* As a result, the Department directed Verizon MA to "include in its monthly quality of service report the number and percentage of PIC [Primary Interexchange Carrier] changes that have been successfully implemented within 24 hours, within two days, and within three to five days." *Id.* The Department further found that this PIC change requirement "should not be overly burdensome" because the

Company “currently tracks and provides to access carriers service performance results that include the number of PIC changes processed for the interLATA market.” *Id.*

2. Verizon MA has included the ILP service measurements in its monthly quality of service reports for nearly 10 years. Since 2001, Verizon MA has completed more than two million PIC changes, of which 98 percent were successfully completed in one day, 99.9 percent within two days, and 100 percent within three to five days. Those results demonstrate that Verizon MA has consistently implemented ILP in a competitively neutral manner and, therefore, there is no reasonable basis for the Department to continue to impose this reporting requirement.

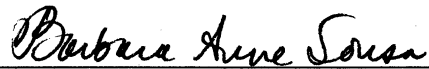
3. Verizon MA’s tracking, compilation and analysis of PIC change data is a time-consuming work effort that has clearly outlived its usefulness from a competitive standpoint. Competitive carriers no longer request nor receive any such PIC change data from Verizon MA. Indeed, Verizon MA currently prepares and provides ILP PIC change service performance results only to the Department solely in compliance with its *ILP Order*. Accordingly, given the fact that there is no competitive need to continue to report those service results, Verizon MA urges the Department to eliminate this reporting requirement.

WHEREFORE, Verizon MA requests that the Department grant this Petition as
filed.

Respectfully submitted,

VERIZON MASSACHUSETTS

Its Attorneys,



Alexander W. Moore

Barbara Anne Sousa

185 Franklin Street, 13th Floor

Boston, Massachusetts 02110-1585

(617) 743-7331

Dated: March 20, 2006